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July 20, 2004

To: All Phase I EVR Vapor Recovery Manufacturers

California Air Resources Board (ARB) staff would like your input regarding the development of a standardized Phase I EVR system contractor/installer training program. Section 11 of the Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities (CP-201) requires all vapor recovery system manufacturers to provide a contractor-training plan in order to ensure proper installation of systems. Specifically, section 11.5.2. states the following:

The installation and maintenance plan shall be submitted, and shall include the following items: . . . A plan for training installers in the proper installation of the system.

During the California Air Pollution Control Officer's Association (CAPCOA)-Vapor Recovery Committee review process of the recently certified CNI, EBW, Phil-Tite, and OPW Phase I EVR systems, it was noted that a standardized training plan format was desirable. Unfortunately, the language in section 11.5.2 of CP-201 is general and does not provide specific guidelines. In response, ARB has agreed to work with CAPCOA to define the key elements of the training plan. The following outline provides a proposed list of requirements of the contractor/installer training plan.

We would appreciate your comments and suggestions on the following proposed training plan guidelines/requirements. Please provide a written response no later than August 31, 2004. Written comments should be submitted by mail, e-mail, or fax to:

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A copy of this letter, as well as a summary of comments and our responses, will be posted on the ARB Vapor Recovery Website at <http://www.arb.ca.gov/vapor/vapor.htm>.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

Proposed Phase I EVR System Installer/Contractor Training Plan Requirements

Goals

Proper installation of Phase I EVR systems to reduce fugitive emissions, minimize troubleshooting for installers, down time for station operators, and re-inspections for District inspectors.

Administrative Requirements

The training plan should address the following administrative issues:

1. Manufacturer should maintain an online database or similar list, which can be accessed by Districts, listing those individuals who have completed the course.
2. Proof of Certification must be provided with unique serial number for each person who completes and passes training course. For example, a wallet card could be issued for each trained installer to provide proof of completion.
3. Identify the training format. For example, is the training conducted by an instructor in a classroom environment or is it self taught by video, CD-ROM, or written materials?
4. Schedule of courses must be provided, including location, time, duration, fees, and dates.

Course Requirements

At a minimum, the course work should cover the following topics (if applicable):

I. Lecture Material

A) Background

1. ARB Phase I EVR Executive Orders
2. Proper documentation and permitting requirements
3. Difference between EVR and pre-EVR parts

B) Pre-Installation

1. Checklists
2. Torque requirements
3. Proper tools
4. Specialized tools
5. Site prep
6. Safety

C) Installation Instructions

1. Riser prep
2. Drop tube
3. Overfill prevention devices
4. Spill containers
5. Containment components

6. Adaptors
7. ATG caps
8. P/V vent valves
9. Ball floats

D) Maintenance Instructions

1. Drain valves
2. Adaptors
3. P/V valves
4. Drop tubes

E) Troubleshooting

1. Checklists

II. Hands-On Demonstration (could be video)

- A) Spill Container
- B) Riser Pipe Prep
- C) Rain Valve
- D) Drop Tube Overfill Prevention Device
- E) Drop Tube

III. Compliance Testing

A) How to conduct the following ARB test procedures:

1. TP-201.1B: Static Torque of Rotatable Phase I Adaptors
2. TP-201.1D: Leak Rate of Drop Tube Overfill Prevention Devices and Spill Container Drain Valves
3. TP-201.1E: Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves
4. TP-201.3: Determination of 2 Inch WC Static Pressure Performance

B) Special Testing Tools

1. Torque wrench
2. Flow meters
3. Test stands
4. Digital manometers, magnahelic gauges

Exams

Written

Minimum of _____ questions, multiple choice or fill in blanks.

Physical Assembly (if applicable)

Product side spill containment assembly unit.

Other

Provide similar information for District inspectors.